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8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 2010-37

12 **MARINELLE C. BACOLOD**
13 **P.O. Box 193**
Elk Grove, CA 95759

A C C U S A T I O N

14 **Registered Nurse License No. 672602**

15 Respondent.

16
17 Complainant alleges:

18 **PARTIES**

19 1. Heidi Goodman("Complainant") brings this Accusation solely in her official capacity
20 as the Assistant Executive Officer of the Board of Registered Nursing ("Board"), Department of
21 Consumer Affairs.

22 2. On or about January 27, 2006, the Board issued Registered Nurse License Number
23 672602 to Marinelle C. Bacolod ("Respondent"). Respondent's registered nurse license was in
24 full force and effect at all times relevant to the charges brought herein and will expire on May 31,
25 2011, unless renewed.

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4. Code section 2761 states, in pertinent part:

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5. Code section 2765 states:

6. Code section 490, subdivision (a), states:

COST RECOVERY

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1 **CAUSE FOR DISCIPLINE**

2 **(Criminal Conviction)**

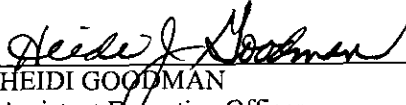
3 8. Respondent is subject to disciplinary action pursuant to Code sections 2761,
4 subdivision (f), and 490, subdivision (a), in that on or about November 1, 2007, in the criminal
5 proceeding titled *People vs. Marinelle C. Bacolod* (Super. Ct. Sacramento County, 2007, Case
6 No. 07F07359), Respondent was convicted by the court on her plea of nolo contendere to
7 violating Penal Code section 261.5, subdivision (c) (unlawful sexual intercourse with a minor
8 three years younger than the perpetrator, a felony). On December 20, 2007, the imposition of
9 Respondent's sentence was suspended and Respondent was placed on probation for a period of 5
10 years on terms and conditions, including that Respondent serve 364 days in the Sacramento
11 County Jail, that Respondent seek and obtain professional sex offender counseling and/or
12 treatment, and that Respondent shall not be in the presence of any minor under the age of 18
13 without a responsible adult present as approved by the probation officer.

14 **PRAYER**

15 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
16 and that following the hearing, the Board of Registered Nursing issue a decision:

- 17 1. Revoking or suspending Registered Nurse License Number 672602, issued to
18 Marinelle C. Bacolod;
19 2. Ordering Marinelle C. Bacolod to pay the Board of Registered Nursing the reasonable
20 costs of the investigation and enforcement of this case, pursuant to Business and Professions
21 Code section 125.3;
22 3. Taking such other and further action as deemed necessary and proper.

23
24 DATED:  7/23/09


HEIDI GOODMAN
Assistant Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant